INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Textron Fastening Systems, PSD Operations
800 West County Road 250 South
Logansport, Indiana 46947

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F017-11464-00027	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 4, 2002 Expiration Date: September 4, 2007

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary metal stamping operation including electroplating, surface coating, and heat treating of metal parts.

Authorized individual:	Clay E. Jackson, Plant Manager
Source Address:	800 West County Road 250 South, Logansport, Indiana 46947
Mailing Address:	P.O. Box 660, Logansport, Indiana 46947-0660
SIC Code:	3469, 3471, 3479, 3398, 3714, 3499
County Location:	Cass
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) one (1) metal part surface coating operation, identified as EU-1, consisting of three (3) metal part dip spin surface coating lines, identified as Lines No. 1, No. 2, and No. 3, constructed in 1989, 1989, and 1985, respectively, using three (3) dip tanks, each coating a maximum of 6000 pounds of metal parts per hour, each exhausting through one (1) stack, identified as S1A-D, S2A-D, and S3A-D.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) one (1) precure oven on coating Line No. 1, with a maximum heat input capacity of 2.0 million British thermal units (MMBtu) per hour;
(2) one (1) cure oven on coating Line No. 1, with a maximum heat input capacity of 3.0 MMBtu per hour;
(3) one (1) precure oven on coating Line No. 2, with a maximum heat input capacity of 2.0 MMBtu per hour;
(4) one (1) cure oven on coating Line No. 2, with a maximum heat input capacity of 3.0 MMBtu per hour;
(5) one (1) precure oven on coating Line No. 3, with a maximum heat input capacity of 0.5 million British thermal units (MMBtu) per hour;
(6) one (1) cure oven on coating Line No. 3, with a maximum heat input capacity of 2.0 MMBtu per hour; and
(7) twelve (12) tube burners for the heat treat furnace, each with a maximum heat input capacity of 0.6 MMBtu per hour.

(b) Combustion source flame safety purging on startup.

(c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(d) Refractory storage not requiring air pollution control equipment.

(e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(f) Machining where an aqueous cutting coolant continuously floods the machining interface.

(g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including:
(1) one (1) Safety Kleen sink for parts washing.

(h) Cleaners and solvents characterized as follows:
(1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100ºF) or;
(2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20ºC (68ºF);
the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

(j) Closed loop heating and cooling systems.

(k) Rolling oil recovery systems.

(l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(m) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(n) Noncontact cooling tower systems with forced and induced draft cooling tower systems not regulated under a NESHAP.

(o) Quenching operations used with heat treating processes.

(p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(q) Paved and unpaved roads and parking lots with public access.

(r) Enclosed conveyor systems for conveying plastic raw materials and plastic finished goods.

(s) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(t) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(u) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

(v) Emergency generators as follows: Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.

(w) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4,000 actual cubic feet per minute (acfm), including the following:

(1) one (1) tool grinding operation, identified as EU2, with a maximum process weight rate of 43.2 pounds per hour, with particulate matter emissions controlled by two (2) filter dust collectors, whose exhausts are recirculated back into the grinding room, resulting in negligible potential or actual emissions to the atmosphere.

(x) A laboratory as defined in 326 IAC 2-7-1(21)(C).

(y) Farm operations.

(z) Other categories with emissions below insignificant thresholds:

(1) one (1) plastic automotive latch coating line, identified as EU4, including:
(A) one (1) water based coating HVLP surface coating spray booth, with PM(PM10) overspray emissions controlled by a dry filter system, with emissions exhausted through stack S6;
(B) one (1) ancillary chain-on-edge parts conveyor; and
(C) one (1) 0.4 MMBtu per hour natural gas fired curing oven, with emissions exhausted through stack S7.

(2) one (1) zinc electroplating process, emitting less than 5 pounds per day of hydrochloric acid gas emissions from metal cleaning operation.

(3) one (1) natural gas-fired heat treat/carburizing furnace, identified as EU3, using methanol to produce a carbon monoxide and hydrogen rich atmosphere, equipped with twelve (12) natural-gas fired tube burners, each with a maximum heat input capacity of 0.6 MMBtu per hour, and one (1) integrally designed open flame exit burner, which combusts carbon monoxide with a 98% control efficiency, emitting less than 25 pounds per day of carbon monoxide.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(e)(2)]

Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt by 326 IAC 6-3-1 or already regulated by 326 IAC 6-3-2(b) through (d), and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD));

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit***(s)*** vented to the control equipment is ***(are)*** in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial thirty (30) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) one (1) metal part surface coating operation, identified as EU-1, consisting of three (3) metal part dip spin surface coating lines, identified as Lines No. 1, No. 2, and No. 3, constructed in 1989, 1989, and 1985, respectively, using three (3) dip tanks, each coating a maximum of 6000 pounds of metal parts per hour, each exhausting through one (1) stack, identified as S1A-D, S2A-D, and S3A-D.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8] [326 IAC 8-2-9]

The metal part surface coating operation (EU-1) shall use less than 25 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period after subtraction of VOC disposed of as waste. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-7 (Part 70 Operating Permit Program) and 326 IAC 8-2-9 (Miscellaneous Metal Coating) not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

(a) The metal part surface coating operation (EU-1) shall use less than 23.43 tons of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period after subtraction of HAPs disposed of as waste. This usage limit is required to limit the source-wide potential to emit, including insignificant activities, of any combination of HAPs to less than 25 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-7 (Part 70 Operating Permit Program) not applicable.

(b) The metal part surface coating operation (EU-1) shall use less than 9.5 tons of any glycol ether (a HAP), including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period after subtraction of glycol ether disposed of as waste. This usage limit is required to limit the source-wide potential to emit, including insignificant activities, of any single HAP to less than 10 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-7 (Part 70 Operating Permit Program) not applicable.

(c) The metal part surface coating operation (EU-1) shall use less than 10.0 tons of any other single HAP, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period after subtraction of any single HAP disposed of as waste. This usage limit is required to limit the source-wide potential to emit of any single HAP to less than 10 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-7 (Part 70 Operating Permit Program) not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.5 VOC and HAP Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the net volatile organic compound and hazardous air pollutant usage for the twelve (12) month period. The following equation shall be used to calculate the net VOC and HAP usage:

VOC/HAP usage = (VOC/HAP input) - (VOC/HAP output in waste)

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.6 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the months of use;

(3) The amount of waste material disposed of for each month;

(4) The cleanup solvent usage for each month;

(5) The net VOC and HAP usage for each month; and

(6) The weight of VOCs and HAPs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including:
(1) one (1) Safety Kleen sink for parts washing.

(w) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4,000 actual cubic feet per minute (acfm), including the following:

(1) one (1) tool grinding operation, identified as EU2, with a maximum process weight rate of 43.2 pounds per hour, with particulate matter emissions controlled by two (2) filter dust collectors, whose exhausts are recirculated back into the grinding room, resulting in negligible potential or actual emissions to the atmosphere.

(z) Other categories with emissions below insignificant thresholds:

(1) one (1) plastic automotive latch coating line, identified as EU4, including:
(A) one (1) water based coating HVLP surface coating spray booth, with PM(PM10) overspray emissions controlled by a dry filter system, with emissions exhausted through stack S6;
(B) one (1) ancillary chain-on-edge parts conveyor; and
(C) one (1) 0.4 MMBtu per hour natural gas fired curing oven, with emissions exhausted through stack S7.

(3) one (1) natural gas-fired heat treat/carburizing furnace, identified as EU3, using methanol to produce a carbon monoxide and hydrogen rich atmosphere, equipped with twelve (12) natural-gas fired tube burners, each with a maximum heat input capacity of 0.6 MMBtu per hour, and one (1) integrally designed open flame exit burner, which combusts carbon monoxide with a 98% control efficiency, emitting less than 25 pounds per day of carbon monoxide.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Degreasing Operations

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Process Weight Activities

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.2 Particulate [326 IAC 6-3-2][40 CFR 52, Subpart P]

(a) Pursuant to 40 CFR 52, Subpart P, the allowable PM emission rate from the plastic automotive latch coating line, identified as EU4, shall not exceed the allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the tool grinding operation, identified as EU2, shall be limited to 0.31 pounds per hour, based on a process weight rate of 43.2 pounds per hour and the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Compliance Determination Requirement

D.2.3 Particulate Matter (PM)

(a) Pursuant to Exemption No. 017-10857-00027, issued on May 18, 1999, and in order to comply with D.2.2(a), the dry filters for PM control shall be in operation and control emissions from the plastic automotive latch coating line at all times that the plastic automotive latch coating line is in operation.

(b) In order to comply with D.2.2(b), the two (2) filter dust collectors for PM control shall be in operation and control emissions from the tool grinding operation at all times that the tool grinding operation is in operation.

D.2.4 Carbon Monoxide (CO)

The one (1) open flame exit burner for CO control shall be in operation and control emissions from the heat treat/carburizing furnace (EU3) at all times that the furnace is in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Textron Fastening Systems, PSD Operations
Source Address: 800 West County Road 250 South, Logansport, Indiana 46947
Mailing Address: P.O. Box 660, Logansport, Indiana 46947-0660
FESOP No.: F017-11464-00027

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Textron Fastening Systems, PSD Operations
Source Address: 800 West County Road 250 South, Logansport, Indiana 46947
Mailing Address: P.O. Box 660, Logansport, Indiana 46947-0660
FESOP No.: F017-11464-00027

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Textron Fastening Systems, PSD Operations
Source Address: 800 West County Road 250 South, Logansport, Indiana 46947
Mailing Address: P.O. Box 660, Logansport, Indiana 46947-0660
FESOP No.: F017-11464-00027
Facility: metal parts surface coating operation (EU-1)
Parameter: net VOC and HAP usage
Limit: The metal part surface coating operation (EU-1) shall use less than 25 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period after subtraction of VOC disposed of as waste. The metal part surface coating operation (EU-1) shall use less than 23.43 tons of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period after subtraction of HAPs disposed of as waste. The metal part surface coating operation (EU-1) shall use less than 9.5 tons of any glycol ether (a HAP), including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period after subtraction of glycol ether disposed of as waste. The metal part surface coating operation (EU-1) shall use less than 10.0 tons of any other single HAP, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period after subtraction of any single HAP disposed of as waste. The following equation shall be used to calculate net VOC and HAP usage: VOC/HAP usage = (VOC/HAP input) - (VOC/HAP output in waste)

YEAR: _____

Month	Column 1a	Column 1b	Column 1c	Column 2a	Column 2b	Column 2c	Column 1a + 2a	Column 1b + 2b	Column 1c + Column 2c
	Single HAP Usage This Month* (tons)	Total HAP Usage This Month (tons)	VOC Usage This Month (tons)	Single HAP Usage Previous 11 Months* (tons)	Total HAP Usage Previous 11 Months (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total Single HAP Usage* (tons)	12 Month Total HAP Usage (tons)	12 Month Total VOC Usage (tons)
Month 1									
Month 2									
Month 3									

* Single HAP usage represents usage of the single HAP with the highest usage rate.

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Textron Fastening Systems, PSD Operations
Source Address: 800 West County Road 250 South, Logansport, Indiana 46947
Mailing Address: P.O. Box 660, Logansport, Indiana 46947-0660
FESOP No.: F017-11464-00027

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name: **Textron Fastening Systems, PSD Operations**
Source Location: **800 West County Road 250 South, Logansport, Indiana 46947**
County: **Cass**
SIC Code: **3469, 3471, 3479, 3398, 3714, 3499**
Operation Permit No.: **F017-11464-00027**
Permit Reviewer: **Trish Earls/EVP**

On July 3, 2002, the Office of Air Quality (OAQ) had a notice published in the Pharos Tribune, Logansport, Indiana, stating that Elco-Textron, Inc., now Textron Fastening Systems, PSD Operations, had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary metal stamping operation including electroplating, surface coating, and heat treating of metal parts. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On August 2, 2002, John Wellspring of Secor International Inc. submitted comments on behalf of Elco-Textron, Inc., now Textron Fastening Systems, PSD Operations. The summary of the comments and responses is as follows:

Comment #1

The name of this source has been changed from Elco-Textron, Inc. to Textron Fastening Systems, PSD Operations. Please revise the FESOP to reflect this.

Response #1

The name of the source is now changed from Elco-Textron, Inc. to Textron Fastening Systems, PSD Operations in all sections of the FESOP where the source name appears.

Comment #2

In section A.1, change the name of the Authorized Individual from Larry Dunn, President to Clay E. Jackson, Plant Manager.

Also in section A.1, please make the following SIC code changes:

3469 Metal Stampings, NEC - No change
3429 Hardware, NEC - Remove
3471 Electroplating, Plating, Polishing, Anodizing, and Coloring - No change
3479 Coating, Engraving, and Allied Services - No change
3398 Metal Heat Treating - No change
3714 Motor Vehicle Parts and Accessories - Add

3499 Fabricated Metal Products, NEC - Add

Response #2

Section A.1 is revised to read as follows:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary metal stamping operation including electroplating, surface coating, and heat treating of metal parts.

Authorized individual:	~~Larry Dunn, President~~ **Clay E. Jackson, Plant Manager**
Source Address:	800 West County Road 250 South, Logansport, Indiana 46947
Mailing Address:	P.O. Box 660, Logansport, Indiana 46947-0660
SIC Code:	3469, ~~3429,~~ 3471, 3479, 3398**, 3714, 3499**
County Location:	Cass
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. Conditions C.1 and D.2.2 have been revised to incorporate the 326 IAC 6-3 revisions that were adopted on February 6, 2002, and became effective on June 12, 2002. Previously, the terms "particulate" and "particulate matter" were both used in the 326 IAC 6-3, but now the term "particulate" is used consistently in 326 IAC 6-3.

C.1 Particulate ~~Matter~~ Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(~~c~~**e**)**(2)**]

Pursuant to 326 IAC 6-3-2(~~c~~**e**)**(2)**, the allowable particulate ~~matter~~ emissions rate from any process not ~~already regulated by 326 IAC 6-1 or any New Source Performance Standard~~ **exempt by 326 IAC 6-3-1 or already regulated by 326 IAC 6-3-2(b) through (d)**, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

The requirement in condition D.2.2(a) is from the previous version of 326 IAC 6-3 (Process Operations) that has been approved into the SIP will remain an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action. Therefore, condition D.2.2(a) has been revised to clarify that the authority for this condition is from the SIP by adding the rule cite for 40 CFR 52, Subpart P.

D.2.2 Particulate ~~Matter (PM)~~ [326 IAC 6-3-2]**[40 CFR 52, Subpart P]**

(a) Pursuant to ~~326 IAC 6-3-2 (Process Operations)~~ **40 CFR 52, Subpart P**, the allowable PM emission rate from the plastic automotive latch coating line, identified as EU4, shall not exceed **the** allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-2 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the ~~PM~~ **particulate** emissions from the tool grinding operation, identified as EU2, shall be limited to 0.31 pounds per hour, based on a process weight rate of 43.2 pounds per hour and the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name:	**Elco-Textron, Inc.**
Source Location:	**800 West County Road 250 South, Logansport, Indiana 46947**
County:	**Cass**
SIC Code:	**3469, 3429, 3471, 3479, 3398**
Operation Permit No.:	**F017-11464-00027**
Permit Reviewer:	**Trish Earls/EVP**

The Office of Air Quality (OAQ) has reviewed a FESOP application from Elco-Textron, Inc. relating to the operation of a metal stamping operation including electroplating, surface coating, and heat treating of metal parts.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) one (1) metal part surface coating operation, identified as EU-1, consisting of three (3) metal part dip spin surface coating lines, identified as Lines No. 1, No. 2, and No. 3, constructed in 1989, 1989, and 1985, respectively, using three (3) dip tanks, each coating a maximum of 6000 pounds of metal parts per hour, each exhausting through one (1) stack, identified as S1A-D, S2A-D, and S3A-D.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) one (1) precure oven on coating Line No. 1, with a maximum heat input capacity of 2.0 million British thermal units (MMBtu) per hour;
(2) one (1) cure oven on coating Line No. 1, with a maximum heat input capacity of 3.0 MMBtu per hour;
(3) one (1) precure oven on coating Line No. 2, with a maximum heat input capacity of 2.0 MMBtu per hour;

(4) one (1) cure oven on coating Line No. 2, with a maximum heat input capacity of 3.0 MMBtu per hour;
(5) one (1) precure oven on coating Line No. 3, with a maximum heat input capacity of 0.5 million British thermal units (MMBtu) per hour;
(6) one (1) cure oven on coating Line No. 3, with a maximum heat input capacity of 2.0 MMBtu per hour; and
(7) twelve (12) tube burners for the heat treat furnace, each with a maximum heat input capacity of 0.6 MMBtu per hour.

(b) Combustion source flame safety purging on startup.

(c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(d) Refractory storage not requiring air pollution control equipment.

(e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(f) Machining where an aqueous cutting coolant continuously floods the machining interface.

(g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including:
(1) one (1) Safety Kleen sink for parts washing.

(h) Cleaners and solvents characterized as follows:
(1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100ºF) or;
(2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20ºC (68ºF);
the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(j) Closed loop heating and cooling systems.

(k) Rolling oil recovery systems.

(l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(m) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(n) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.

(o) Quenching operations used with heat treating processes.

(p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(q) Paved and unpaved roads and parking lots with public access.

(r) Enclosed conveyor systems for conveying plastic raw materials and plastic finished goods.

(s) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(t) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(u) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

(v) Emergency generators as follows: Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.

(w) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4,000 actual cubic feet per minute (acfm), including the following:

(1) one (1) tool grinding operation, identified as EU2, with a maximum process weight rate of 43.2 pounds per hour, with particulate matter emissions controlled by two (2) filter dust collectors, whose exhausts are recirculated back into the grinding room, resulting in negligible potential or actual emissions to the atmosphere.

(x) A laboratory as defined in 326 IAC 2-7-1(21)(C).

(y) Farm operations.

(z) Other categories with emissions below insignificant thresholds:

(1) one (1) plastic automotive latch coating line, identified as EU4, including:
(A) one (1) water based coating HVLP surface coating spray booth, with PM(PM10) overspray emissions controlled by a dry filter system, with emissions exhausted through stack S6;
(B) one (1) ancillary chain-on-edge parts conveyor; and
(C) one (1) 0.4 MMBtu per hour natural gas fired curing oven, with emissions exhausted through stack S7.

(2) one (1) zinc electroplating process, emitting less than 5 pounds per day of hydrochloric acid gas emissions from metal cleaning operation.

(3) one (1) natural gas-fired heat treat/carburizing furnace, identified as EU3, using methanol to produce a carbon monoxide and hydrogen rich atmosphere, equipped with twelve (12) natural-gas fired tube burners, each with a maximum heat input capacity of 0.6 MMBtu per hour, and one (1) integrally designed open flame exit burner, which combusts carbon monoxide with a 98% control efficiency, emitting less than 25 pounds per day of carbon monoxide.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Exemption, issued on March 12, 1981 (Note: the degreaser included in this exemption has been removed from the source);

(b) Exemption, issued on February 28, 1985;

(c) Construction Permit PC (09) 1737, issued April 19, 1989;

(d) Operation Permit 09-03-93-0170, issued May 1, 1989; and

(b) Exemption No. 017-10857-00027, issued May 18, 1999.

All conditions from previous approvals were incorporated into this FESOP.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the open flame exit burner be considered as an integral part of the heat treat/carburizing furnace (EU3):

(a) The following is information that Elco-Textron received from Mr. Dan Kernell at AFC-Holcroft, the manufacturer of the heat treat furnace. The manufacturer has confirmed that there are two sources of furnace emissions, combustion by-products from the natural gas fired tube heaters, and combustion by-products from the furnace atmosphere exit burner.

The furnace is equipped with a total of 12 natural gas-fired Eclipse tube burners with a maximum firing rate of 600,000 Btu/hr each. These provide heat to the heat treat furnace.

The furnace atmosphere consists of nitrogen, carbon monoxide and hydrogen gas and is burned as it exits the furnace. A pilot flame ignites the furnace gas as soon as it exits the furnace. The pilot flame at the exit is an integral part of the furnace. The furnace cannot be safely operated unless the pilot flame is lit and the furnace gas is being burned at the furnace door. The atmosphere inside the furnace is clearly flammable and hazardous due to H and CO. The furnace atmosphere operates under positive pressure to keep oxygen from entering the furnace. There is a constant flow of methanol and nitrogen into the furnace to keep the furnace atmosphere under positive pressure. Therefore, by design, furnace atmospheric gas is continuously purged from the furnace. For the unit to operate as it is designed, this continuous purge of furnace gas must be burned as it exits the furnace. The exit flame burners have flame igniters and sensors which detect the presence of a flame. The furnace will not feed methanol and therefore will not operate unless the exit flame is present. If for some reason the flame is not operated, there is a risk of explosion from both the Hydrogen and the Carbon Monoxide (both are flammable gas), plus there is a severe health/asphyxiation risk if the carbon monoxide gas were to exit the furnace into the work area. Therefore, the furnace cannot and would not be operated unless the exit gas from the furnace is burned. It is therefore not an optional safety or environmental control, but an integral process and mandatory operating requirement of the furnace that the furnace gas be burned and not simply vented from the furnace.

The total flow of gas into the furnace is 2050 scfh (1200 scfh as methanol and 850 scfh as nitrogen). By weight, 87% of the methanol is converted to CO, while 13% of the methanol is converted to hydrogen. The exhaust from the furnace is burned in the open flame, and primarily produces the combustion by-products provided by the manufacturer below (CO_2 and H_2O). There is a convection vent directly above the exit burner which routes the furnace gas emissions out of the plant.

The open flame is not unlike a refinery flare, which continuously burns a mixture of pilot and purge gas, except the furnace gas consists of CO and hydrogen with a nitrogen purge. The rate of methanol consumption in the furnace is 53.8 lb/hr (1200 scfh), which produces a maximum of 46.8 lb/hr CO (disregarding CO that is adsorbed by the parts) and 7.0 lb/hr of H_2. The flare could be considered a 98 to 99% efficient integral CO control device, with resultant CO emissions of 0.47 to 0.94 lb/hr.

IDEM, OAQ has evaluated the justifications and agreed that the open flame exit burner will be considered as an integral part of the heat treat/carburizing furnace. Therefore, the permitting level will be determined using the potential to emit after the open flame exit burner. Operating conditions in the proposed permit will specify that this open flame exit burner shall operate at all times when the heat treat/carburizing furnace is in operation.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on October 15, 1999. Additional information was received on March 14, 2000 and February 20, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (6 pages).

Potential To Emit for the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	less than 10
Chromium Cmpds.	less than 10
Naphthalene	less than 10
1,2,4 Trimethylbenzene	less than 10
Ethylene Glycol	less than 10
Glycol Ether	greater than 10
MEK	less than 10
Hexane	less than 10
TOTAL	greater than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	Total HAPs
Metal Parts Surface Coating Lines 1, 2, and 3(1)	0.0	0.0	0.0	< 25.0	0.0	0.0	< 9.5 (Glycol Ether)	< 23.43
Natural Gas Combustion*	0.17	0.67	0.05	0.48	7.40	8.80	0.16 (Hexane)	0.17
Zinc Electroplating*	0.0	0.0	0.0	0.90	0.0	0.0	0.90 (HCl)	0.90
Automotive Latch Coating Line & Tool Grinding*	2.16	2.16	0.0	0.68	0.0	0.0	0.50 (Glycol Ether)	0.50
Heat Treat Furnace*	0.0	0.0	0.0	0.0	4.12	0.0	0.0	0.0
Total Emissions	2.33	2.83	0.05	< 27.06	11.52	8.80	< 10.0	< 25.0

* Insignificant Activities
See note on next page:

(1) Emissions of glycol ether (the worst-case single HAP) are limited to less than 9.5 tons per year from the metal parts surface coating lines such that when combined with the potential glycol ether emissions from the automotive latch coating line (an insignificant activity) the source-wide glycol ether emissions will be limited to less than 10 tons per year. Emissions of all other single HAPs from the metal parts surface coating lines will be limited to less than 10 tons per year.

County Attainment Status

The source is located in Cass County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Cass County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

(c) The degreasing operation at this source, a Safety-Kleen sink for parts washing, is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14 and 40 CFR Part 63, Subpart T, “National Emission Standards for Halogenated Solvent Cleaning”) because it does not use a solvent containing any halogenated HAPs as listed in 40 CFR Part 63.460 (Applicability).

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not subject to the requirements of this rule because the potential to emit of all regulated criteria pollutants is less than 250 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), which would require the source to submit an annual emission statement. Pursuant to this rule, any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is enforceable. This source, which is located in Cass County, has accepted federally enforceable operation conditions which limit emissions of VOC to below 100 tons per year. The potential to emit of all other criteria pollutants is also less than 100 tons per year, therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8 (FESOP)

This source will limit the net usage of VOC (after subtraction of VOC disposed of as waste) in the three (3) dip spin coating lines (Nos. 1, 2, and 3) to less than 25 tons per year, such that source wide VOC emissions are limited to less than 100 tons per year. The source will also limit the net usage of glycol ether in the three (3) dip spin coating lines (Nos. 1, 2, and 3) to less than 9.5 tons per year so that source-wide glycol ether emissions are limited to less than 10 tons per year. The source will also limit the net usage of any other single HAP in the three (3) dip spin coating lines (Nos. 1, 2, and 3) to less than 10.0 tons per year so that source-wide single HAP emissions are limited to less than 10 tons per year. The source will limit the net usage of any combination of HAPs in the three (3) dip spin coating lines (Nos. 1, 2, and 3) to less than 23.43 tons per year such that source wide total HAP emissions are limited to less than 25 tons per year. These HAP limitations include potential glycol ether (a HAP) emissions from the plastic automotive latch coating line (an insignificant activity) of 0.5 tons per year, potential hexane emissions of 0.17 tons per year from the insignificant combustion unit emissions, and potential hydrochloric acid emissions from the zinc electroplating operation (an insignificant activity) of 0.9 tons per year.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This source is not subject to the requirements of this rule because it has accepted federally enforceable permit conditions which will limit the potential to emit of any single HAP and any combination of HAPs to less than 10 and 25 tons per year, respectively.

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to Exemption No. 017-10857-00027, issued on May 18, 1999, the particulate matter (PM) from the plastic automotive latch coating line, identified as EU4, shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filter system shall be in operation at all times the coating line (EU4) is in operation, in order to comply with this limit.

(b) The PM emissions from the tool grinding operation, identified as EU2, shall be limited to 0.31 pounds per hour, based on a process weight rate of 43.2 pounds per hour and the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The two (2) filter dust collectors shall be in operation at all times the tool grinding operation is in operation, in order to comply with this limit.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The three (3) dip spin coating lines (Nos. 1, 2, and 3), constructed in 1989, 1989, and 1985, respectively, are not subject to the requirements of this rule because the source has accepted federally enforceable emission limitations which limit the net usage of VOC in the three (3) coating lines to less than 25 tons per year.

326 IAC 8-3-2 (Cold Cleaner Operations)

The degreasing operation at this source is subject to this rule because it was constructed after January 1, 1980 and before July 1, 1990, and is cold cleaner degreaser. Pursuant to this rule, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Testing Requirements

Testing on the three (3) dip spin coating lines is not necessary since compliance with the VOC usage and HAP usage limits pursuant to 326 IAC 2-8 can be determined through material usage records and reports.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to this source.

Conclusion

The operation of this metal stamping operation including electroplating, surface coating, and heat treating of metal parts shall be subject to the conditions of the attached proposed (FESOP No.: F017-11464-00027).

Appendix A: Emission Calculations Summary

Company Name: Textron Fastening Systems, PSD Operations
Address City IN Zip: 800 West County Road 250 South, Logansport, Indiana 46947
Operation Permit No.: F017-11464-00027
Plt ID: 017-00027
Reviewer: Trish Earls
Date: October 15, 1999

Potential Emissions (tons/year)

	Emissions Generating Activity					
Pollutant	Surface Coating	Natural Gas Combustion*	Zinc Electoplating*	Automotive Latch Coating Line & Tool Grinding*	Heat Treat Furnace*	**TOTAL**
PM	0.00	0.17	0.00	2.16	0.00	2.33
PM10	0.00	0.67	0.00	2.16	0.00	2.83
SO2	0.00	0.05	0.00	0.00	0.00	0.05
NOx	0.00	8.80	0.00	0.00	0.00	8.80
VOC	110.62	0.48	0.90	0.68	0.00	112.68
CO**	0.00	7.40	0.00	0.00	4.12	11.52
total HAPs	93.73	0.17	0.90	0.50	0.00	95.30
worst case single HAP	(Glycol Ether) 64.86	(Hexane) 0.16	(Hydrochloric Acid) 0.90	(Glycol Ether) 0.50	0.00	(Glycol Ether) 65.36

Total emissions based on rated capacity at 8,760 hours/year.

* Insignificant Activity. Natural Gas Combustion emissions include emissions from 12 tube burners used in conjunction with the heat treat furnace.

** CO emissions of 4.12 tons/yr from the carburizing process in the heat treat furnace was determined based on manufacturer's data.

Controlled Emissions (tons/year)

	Emissions Generating Activity					
Pollutant	Surface Coating	Natural Gas Combustion*	Zinc Electoplating*	Automotive Latch Coating Line & Tool Grinding*	Heat Treat Furnace*	**TOTAL**
PM	0.00	0.17	0.00	2.16	0.00	2.33
PM10	0.00	0.67	0.00	2.16	0.00	2.83
SO2	0.00	0.05	0.00	0.00	0.00	0.05
NOx	0.00	8.80	0.00	0.00	0.00	8.80
VOC	24.90	0.48	0.90	0.68	0.00	26.96
CO	0.00	7.40	0.00	0.00	4.12	11.52
total HAPs	13.58	0.17	0.90	0.50	0.00	15.15
worst case single HAP	(Glycol Ether) 9.40	(Hexane) 0.16	(Hydrochloric Acid) 0.90	(Glycol Ether) 0.50	0.00	(Glycol Ether) 9.90

Total emissions based on rated capacity at 8,760 hours/year.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Textron Fastening Systems, PSD Operations
Address City IN Zip: 800 West County Road 250 South, Logansport, Indiana 46947
Operation Permit No.: F017-11464-00027
Plt ID: 017-00027
Reviewer: Trish Earls
Date: October 15, 1999

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water or Exempt Chemicals	Weight % Organics	Volume % Water or Exempt Chemicals	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Dip Spin Coating Lines 1, 2, and 3																
Magni B06J	12.60	40.00%	0.0%	40.0%	0.0%	23.00%	0.0016	1800.0	5.04	5.04	14.52	348.36	63.58	0.00	21.91	100%
Magni B17	9.41	54.00%	0.0%	54.0%	0.0%	34.25%	0.0016	1800.0	5.08	5.08	14.63	351.23	64.10	0.00	14.84	100%
Magni P04A	8.93	75.50%	0.0%	75.5%	0.0%	16.50%	0.0016	1800.0	6.74	6.74	19.42	466.02	85.05	0.00	40.86	100%
Dacromet 320	11.30	63.30%	57.4%	5.9%	77.9%	9.00%	0.0016	1800.0	3.00	0.66	1.91	45.77	8.35	0.00	7.36	100%
Dacromet 107	9.30	70.60%	65.7%	4.9%	73.4%	19.00%	0.0016	1800.0	1.70	0.45	1.30	31.24	5.70	0.00	2.38	100%
5250/571 Blue	8.87	53.80%	0.0%	53.8%	0.0%	39.51%	0.0016	1800.0	4.77	4.77	13.74	329.84	60.20	0.00	12.08	100%
5251/840 Black	9.60	48.50%	0.0%	48.5%	0.0%	39.37%	0.0016	1800.0	4.66	4.66	13.41	321.82	58.73	0.00	11.83	100%
5901 Gray/Silver	9.13	72.70%	0.0%	72.7%	0.0%	14.35%	0.0016	1800.0	6.64	6.64	19.12	458.78	83.73	0.00	46.25	100%
5901 Bright Silver	9.06	51.00%	0.0%	51.0%	0.0%	40.72%	0.0016	1800.0	4.62	4.62	13.31	319.38	58.29	0.00	11.35	100%
Thinners/Cleaning Solvents																
Aromatic 150	7.46	100.00%	0.0%	100.0%	0.0%	0.00%	0.0004	1800.0	7.46	7.46	5.37	128.91	23.53	0.00	NA	100%
S-232	7.06	100.00%	50.0%	50.0%	53.6%	0.00%	0.0004	1800.0	7.60	3.53	2.54	61.00	11.13	0.00	NA	100%
PM Acetate	8.11	100.00%	0.0%	100.0%	0.0%	0.00%	0.0004	1800.0	8.11	8.11	5.84	140.14	25.58	0.00	NA	100%
Magni 777	6.67	100.00%	0.0%	100.0%	0.0%	0.00%	0.0004	1800.0	6.67	6.67	4.80	115.26	21.03	0.00	NA	100%
Total State Potential Emissions:											**25.26**	**606.16**	**110.62**	**0.00**		

Federal Potential Emissions (controlled):

	Material Usage Limitation	Control Efficiency: VOC	Control Efficiency: PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
Total Federal Potential Emissions:	22.51%	0.00%	0.00%	**5.68**	**136.44**	**24.90**	**0.00**

Note: At a 22.51% annual material usage limitation, VOC emissions are limited to less than 25 tons per year, therefore, 326 IAC 8-2-9 does not apply. Also, since VOC emissions are limited to less than 100 tons per year, 326 IAC 2-7 does not apply.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Surface Coating HAP Emission Calculations
Page 1 of 2

Company Name: Textron Fastening Systems, PSD Operations
Address City IN Zip: 800 West County Road 250 South, Logansport, Indiana 46947
Operation Permit No.: F017-11464-00027
Plt ID: 017-00027
Reviewer: Trish Earls
Date: October 15, 1999

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Chromium Compounds	Weight % Naphthalene	Weight % Cumene	Material Usage Limitation	Xylene Emissions (ton/yr)	Chromium Cmpds Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Cumene Emissions (ton/yr)
Dip Spin Coating Lines 1, 2, and 3												
Magni B06J	12.60	0.0016	1800.0	1.01%	0.00%	0.00%	0.00%	14.49%	0.23	0.00	0.00	0.00
Magni B17	9.41	0.0016	1800.0	1.67%	2.54%	0.00%	0.00%	14.49%	0.29	0.44	0.00	0.00
Magni P04A	8.93	0.0016	1800.0	3.33%	0.00%	0.00%	0.00%	14.49%	0.54	0.00	0.00	0.00
Dacromet 320	11.30	0.0016	1800.0	0.00%	5.00%	0.00%	0.00%	14.49%	0.00	1.03	0.00	0.00
Dacromet 107	9.30	0.0016	1800.0	0.00%	0.00%	0.00%	0.00%	14.49%	0.00	0.00	0.00	0.00
5250/571 Blue	8.87	0.0016	1800.0	0.00%	0.00%	0.00%	0.00%	14.49%	0.00	0.00	0.00	0.00
5251/840 Black	9.60	0.0016	1800.0	0.00%	1.45%	0.00%	0.00%	14.49%	0.00	0.25	0.00	0.00
5901 Gray/Silver	9.13	0.0016	1800.0	0.00%	0.00%	0.00%	0.00%	14.49%	0.00	0.00	0.00	0.00
5901 Bright Silver	9.06	0.0016	1800.0	0.00%	0.00%	0.00%	0.00%	14.49%	0.00	0.00	0.00	0.00
Thinners/Cleaning Solvents												
Aromatic 150	7.46	0.0004	1800.0	0.50%	0.00%	9.90%	0.10%	14.49%	0.02	0.00	0.34	0.00
S-232	7.06	0.0004	1800.0	0.00%	0.00%	0.00%	0.00%	14.49%	0.00	0.00	0.00	0.00
PM Acetate	8.11	0.0004	1800.0	0.00%	0.00%	0.00%	0.00%	14.49%	0.00	0.00	0.00	0.00
Magni 777	6.67	0.0004	1800.0	0.00%	0.00%	0.00%	0.00%	14.49%	0.00	0.00	0.00	0.00
									0.56	**1.03**	**0.34**	**0.00**

Note: At a 14.49% annual material usage limitation, single HAP emissions are limited to less than 10 tons per year and total HAP emissions are limited to less than 25 tons per year, therefore, 326 IAC 2-7 does not app

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * Material Usage Limitation (%)

Appendix A: Emissions Calculations
Surface Coating HAP Emission Calculations
Page 2 of 2

Company Name: Textron Fastening Systems, PSD Operations
Address City IN Zip: 800 West County Road 250 South, Logansport, Indiana 46947
Operation Permit No.: F017-11464-00027
Plt ID: 017-00027
Reviewer: Trish Earls
Date: October 15, 1999

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % 1,2,4 Trimethyl-benzene	Weight % Ethylene Glycol	Weight % Glycol Ether	Weight % MEK	Material Usage Limitation	1,2,4 Trimethyl-benzene Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	MEK Emissions (ton/yr)
Dip Spin Coating Lines 1, 2, and 3												
Magni B06J	12.60	0.0016	1800.0	0.00%	0.00%	0.00%	0.00%	14.49%	0.00	0.00	0.00	0.00
Magni B17	9.41	0.0016	1800.0	0.00%	0.00%	0.00%	0.00%	14.49%	0.00	0.00	0.00	0.00
Magni P04A	8.93	0.0016	1800.0	0.00%	0.00%	0.00%	0.00%	14.49%	0.00	0.00	0.00	0.00
Dacromet 320	11.30	0.0016	1800.0	0.00%	0.00%	0.00%	0.00%	14.49%	0.00	0.00	0.00	0.00
Dacromet 107	9.30	0.0016	1800.0	0.00%	3.00%	0.00%	0.00%	14.49%	0.00	0.51	0.00	0.00
5250/571 Blue	8.87	0.0016	1800.0	0.00%	0.00%	47.25%	0.00%	14.49%	0.00	0.00	7.66	0.00
5251/840 Black	9.60	0.0016	1800.0	0.00%	0.00%	41.26%	6.46%	14.49%	0.00	0.00	7.24	1.13
5901 Gray/Silver	9.13	0.0016	1800.0	0.00%	0.00%	56.32%	0.00%	14.49%	0.00	0.00	9.40	0.00
5901 Bright Silver	9.06	0.0016	1800.0	3.31%	0.00%	27.28%	0.00%	14.49%	0.55	0.00	4.52	0.00
Thinners/Cleaning Solvents												
Aromatic 150	7.46	0.0004	1800.0	1.70%	0.00%	0.00%	0.00%	14.49%	0.06	0.00	0.00	0.00
S-232	7.06	0.0004	1800.0	0.00%	0.00%	0.00%	0.00%	14.49%	0.00	0.00	0.00	0.00
PM Acetate	8.11	0.0004	1800.0	0.00%	0.00%	0.00%	0.00%	14.49%	0.00	0.00	0.00	0.00
Magni 777	6.67	0.0004	1800.0	0.00%	0.00%	0.00%	0.00%	14.49%	0.00	0.00	0.00	0.00
									0.61	**0.51**	**9.40**	**1.13**

Total HAP Emissions: **13.58**

Note: At a 14.49% annual material usage limitation, single HAP emissions are limited to less than 10 tons per year and total HAP emissions are limited to less than 25 tons per year, therefore, 326 IAC 2-7 does not app

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * Material Usage Limitation (%)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: Textron Fastening Systems, PSD Operations
Address City IN Zip: 800 West County Road 250 South, Logansport, Indiana 46947
Operation Permit No.: F017-11464-00027
Plt ID: 017-00027
Reviewer: Trish Earls
Date: October 15, 1999

Heat Input Capacity MMBtu/hr		Potential Throughput MMCF/yr
12.9	Curing Ovens	113.0
7.2	Tube Burners for Heat Treat Furnace	63.1

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr (Curing Ovens)	0.11	0.43	0.03	5.65	0.31	4.75
Potential Emission in tons/yr (Tube Burners)	0.06	0.24	0.02	3.15	0.17	2.65

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: Textron Fastening Systems, PSD Operations
Address City IN Zip: 800 West County Road 250 South, Logansport, Indiana 46947
Operation Permit No.: F017-11464-00027
Plt ID: 017-00027
Reviewer: Trish Earls
Date: October 15, 1999

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr (Curing Ovens)	1.187E-04	6.780E-05	4.238E-03	1.017E-01	1.921E-04
Potential Emission in tons/yr (Tube Burners)	6.623E-05	3.784E-05	2.365E-03	5.676E-02	1.072E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr (Curing Ovens)	2.825E-05	6.215E-05	7.910E-05	2.147E-05	1.187E-04
Potential Emission in tons/yr (Tube Burners)	1.577E-05	3.469E-05	4.415E-05	1.198E-05	6.623E-05

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.